

Kolman Ely P.C.

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July 3, 2018

VIA ECF ONLY

Honorable Joel H. Slomsky
United States District Court, Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Room 5614
Philadelphia, PA 19106

**RE: Joydeep Bose v. Lane's Valley Forge Aviation, Inc. et al
2:16-CV-03924-JHS
Informal Motion to Compel**

Dear Judge Slomsky,

I am writing regarding the significant problems the Plaintiff is having regarding discovery and depositions.

Plaintiff's Interrogatories and Request for Production of Documents were sent to the defense on May 25, 2018. No extension was ever requested by the Defendants. As of the date of this letter, our discovery requests have not been answered. Despite making requests for Initial Disclosures, we still do not have them.

In addition, we have attempted to schedule the Defendant's deposition, but have received a constant run around, with no dates. Finally, we received an email demanding our client's deposition before the Defendant. I have attached this email correspondence showing our good faith attempts to schedule the Defendant's deposition.

I have also attached the cover letter to our discovery requests, dated April 30, 2018. Finally, I cannot properly complete the Defendant's deposition without the requested documents and I am at a significant disadvantage given that the Defendant has refused to give me initial disclosures.

Respectfully Submitted,

s/ Timothy M. Kolman
Timothy M. Kolman, Esquire

TMK/blc

Barbara Cook

From: Beasley Jr., James <Jim.Beasley@beasleyfirm.com>
Sent: Thursday, June 28, 2018 6:39 PM
To: Timothy Kolman
Cc: Volpe, Janet; Barbara Cook; W. Charles Sipio; Wayne Ely; Jubb, Lane R.; Applegate, Amanda
Subject: Re: Bose v. Lane's Valley Forge Aviation, et al.

We are available to do Mr. Jubb's deposition the same day you can produce Mr. Bose. We will do Mr. Bose in the morning and Mr. Jubb in the afternoon. Please let us know when you can contact him and obtain dates for his deposition.

James E. Beasley Jr., M.D., LL.M.
The Beasley Firm, LLC
1125 Walnut Street
Philadelphia, PA 19107
215.931.2689
215.592.1523 (direct telefax)
jim.beasley@beasleyfirm.com
www.beasleyfirm.com

On Jun 28, 2018, at 13:50, Timothy Kolman <tkolman@kolmanlaw.net> wrote:

So when are they available exactly?

From: Volpe, Janet [<mailto:Janet.Volpe@beasleyfirm.com>]
Sent: Thursday, June 28, 2018 10:22 AM
To: Barbara Cook
Cc: Timothy Kolman; W. Charles Sipio; Wayne Ely; Jubb, Lane R.; Beasley Jr., James; Applegate, Amanda
Subject: Bose v. Lane's Valley Forge Aviation, et al.

Dear Ms. Cook,

Mr. Beasley and Mr. Jubb are not available on any of the dates that you proposed for Mr. Jubb's deposition due to their trial schedules.

Thank you.

Janet Volpe
The Beasley Firm, LLC
Legal Assistant
(215) 931-2665

From: Barbara Cook [<mailto:BCook@kolmanlaw.net>]
Sent: Thursday, June 28, 2018 9:51 AM
To: Beasley Jr., James; Jubb, Lane R.
Cc: Timothy Kolman; Wayne Ely; W. Charles Sipio
Subject: RE: Bose v. Lane's Valley Forge Aviation, et al.

Good Morning Mr. Beasley,

I'm contacting you today to schedule the deposition for Mr. Lane Jubb, Esq. Please confirm availability on any of the following dates:

Monday, July 16th

Monday, July 23rd

Tuesday, July 24th

Wednesday, July 25th

Thank you for your attention to this matter,

Barbara L. Cook
Intake, Scheduling & EEOC Paralegal

KOLMAN ELY, P.C.
414 Hulmeville Avenue
Penndel, PA 19047
Phone (215) 750-3134, Ext. 116
Fax (215) 750-3138

www.kolmanelypc.com

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Barbara Cook

From: Jubb, Lane R. <Lane.Jubb@BeasleyFirm.com>
Sent: Wednesday, May 23, 2018 12:10 PM
To: Barbara Cook
Cc: Timothy Kolman; W. Charles Sipio; Wayne Ely; Beasley Jr., James
Subject: RE: Bose v. lane's Valley Forge Aviation, Inc.

I am not available on 6/22. I can be available on 6/25 at 10:30am.
Lane

Lane R. Jubb, Jr., Esq.
THE BEASLEY FIRM, LLC.
1125 Walnut St.
Philadelphia, Pa 19107
215-592-1000
215-592-8360 (Fax)

From: Barbara Cook [<mailto:BCook@kolmanlaw.net>]
Sent: Wednesday, May 23, 2018 11:11 AM
To: Jubb, Lane R.
Cc: Timothy Kolman; W. Charles Sipio; Wayne Ely
Subject: Bose v. lane's Valley Forge Aviation, Inc.

Good Morning Mr. Jubb,

I'm contacting you today to schedule your deposition for above-named matter on Friday, June 22nd at 10AM. Please confirm your availability.

Thank you for your attention to this matter,

Barbara L. Cook
Intake, Scheduling & EEOC Paralegal

KOLMAN ELY, P.C.
414 Hulmeville Avenue
Penn del, PA 19047
Phone (215) 750-3134, Ext. 116
Fax (215) 750-3138

www.kolmanelypc.com

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